

**AHMAD KESHAVARZ**

*Attorney at Law*

16 COURT ST., 26TH FLOOR  
BROOKLYN, NY 11241-1026

[WWW.NEWYORKCONSUMERATTORNEY.COM](http://WWW.NEWYORKCONSUMERATTORNEY.COM)  
E-mail: [ahmad@NewYorkConsumerAttorney.com](mailto:ahmad@NewYorkConsumerAttorney.com)

Telephone: (347) 308-4859  
Fax: (877) 496-7809

August 5, 2022

**VIA ECF**

Magistrate Judge Marcia M. Henry  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: Joint Request to Extend Deadline to Complete Plaintiff's Deposition to  
August 11, 2022 and to File Joint Status Letter by August 17, 2022.**

***Fadlevich v. JD 34<sup>th</sup> Street Realty, LLC, No. 1:19-cv-04227-DG-MMH***

Dear Judge Henry:

On June 2, 2022, Your Honor ordered that the parties shall file a joint status report by 08/10/2022 certifying that discovery has closed and whether they intend to take expert discovery or whether Plaintiff intends to make an application to seek discovery on his state law claims. On August 3, 2022, Plaintiff sat for his deposition in the above-captioned case. However, the total 7 hours of the deposition was not completed, and the parties are only available to complete the remainder on August 11, 2022.

As such, the parties request that the deadline to complete discovery as to Plaintiff's actual damages, including his deposition, be extended by one day from August 10, 2022 to August 11, 2022. This deadline was previously extended by Your Honor's Order on April 22, 2022. Additionally, the parties request the deadline to file the joint status letter certifying that discovery has closed and whether they intend to take expert discovery or whether Plaintiff intends to make an application to seek discovery on his state law claims be extended from August 10, 2022 to August 17, 2022.

Respectfully,

/s/

Ahmad Keshavarz